FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7397

TRIDENT SEAFOODS CORPORATION

Anacortes Plant – Batter & Breading Division

GENERAL INFORMATION	
Applicant	Trident Seafoods, Corp. 5303 Shilshole Avenue NW Seattle, WA 98107
Facility Address	1400 – 4th Street P.O. Box 954 Anacortes, WA 98221
Type of Facility	Secondary Seafood and Food Processing SIC 2091, 2092
Facility Discharge Location	Latitude: 48° 31' 20" N Longitude: 122° 37' 00" W
Treatment Plant Receiving Discharge	City of Anacortes Wastewater Treatment Plant WA-002025-7
Contact at Facility	Mr. Pat Albee, Chief Plant Engineer Phone: 360-293-7701 Fax: 360-293-0185
Responsible Official	Mr. Earl Hubbard, V.P. Regulatory Affairs Mr. Charles H. Bundrant, CEO 5303 Shilshole Avenue NW Seattle, WA 98107

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7397. Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of pretreated process wastewater to the City of Anacortes wastewater treatment plant (WWTP). This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the State is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the State. Regulations adopted by the State include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. Changes to the permit will be addressed in Appendix C—*Response to Comments*.

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

HISTORY

Trident Seafoods Corporation, located in Anacortes, operates a cold storage and seafood/food processing facility formerly owned by Whitney Fidalgo. Trident Seafoods produces over 160 different food products including fish sticks, breaded cheese sticks, onion rings, french toast, and jalapeño sticks.

Trident Seafoods-Anacortes is a secondary seafood and food processing operation and is considered a significant industrial user. They are subject to federal categorical pretreatment standards.

INDUSTRIAL PROCESSES

Frozen fish arrive in large blocks and are sawed into serving size portions, then battered, breaded, frozen, and packaged. Approximately 40% of the portions are par-fried before freezing.

Extruded onion rings, french toast sticks, cheese sticks, and cheese nuggets are processed in the same manner as the fish. About 80% of the wastewater is generated by clean-up and sanitation between the hours of 11:00 pm and 6:30 am.

TREATMENT PROCESSES

All floor drains convey wastewater to a covered outside sump where an oleophilic polypropylene rope skimmer removes oil and grease. The removed oil is deposited into a barrel located outside the treatment shed. All process wastewater flows to this sump. The wastewater is pumped from the sump to a large Baker tank located inside the warehouse.

The solids in the wastewater are allowed to settle for 1-2 hours, then are pumped off the bottom of the tank, dewatered, and put into a container for pick up. The remaining wastewater is pH adjusted with caustic soda to about 10.5 standard units then mixed. Alum is added to coagulate the total suspended solids (TSS). Cationic polymer is mixed in, followed by an anionic polymer. The decant is pumped to the dissolved air flotation treatment (DAFT) system where a skimmer removes more particles.

The decant is pumped to the City of Anacortes wastewater treatment plant. The City conducts 24-hour composite sampling for BOD_5 and TSS every 2-3 months.

Spilled and/or recovered breading material, par-fryer crumbs, leftover batter and breading, and sludge from the treatment process is put into containers and hauled to rendering in Lynden.

PERMIT STATUS

An application for a permit was submitted to the Department on February 15, 1996, and updated in November 1997. A temporary State Waste Discharge Permit became effective February 9, 1998. An updated application was submitted to the Department on May 16, 2003, and was accepted by the Department on May 29, 2003.

SUMMARY OF COMPLIANCE

The facility last received an inspection on March 12, 2001. This facility has an Industrial Wastewater Discharge Agreement with the City of Anacortes, initially issued in June 1993, and updated November 1997. They have remained in compliance with that agreement.

Trident has experienced some foaming problems with the wastewater discharge. The wastewater foams at the point of discharge to the City system. Foam blocks the discharge sewer pipe causing the sewage to discharge to the parking lot and flows to the lot storm drain. Trident has installed equipment to prevent future foaming.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge, as reported by the City of Anacortes, is characterized for the following parameters:

Parameter	Range	Annual Average
Flow, gpd	11,303-22,298	19,147
Biochemical Oxygen Demand, (5-day) mg/L	130-930	<715
Total Suspended Solids, mg/L	58-610	72
pH, standard units	4.95-10.93	7.02

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The minimum requirements to demonstrate compliance with the AKART standard and specific design criteria for this facility have not been determined. An engineering report (Special Condition S4 under Best Management Practices) is required by the permit and will be reviewed by the Department.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the State (WAC 173-216-110). There are no existing federal categorical limitations for fish sticks, onion rings, french toast, and cheese sticks. This is a secondary seafood process so there are no categorical limitations found in 40 CFR Part 408. The categorical limits apply to the primary processing of seafood into product.

In order to protect the City of Anacortes WWTP from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. Only technology-based limits will be used. Technology-based limitations will be protective of sludge use and will ensure an effluent that will not cause interference, pass-through, or hazardous exposure to POTW workers.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the City of Anacortes WWTP from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Anacortes WWTP and codified in the City's sewer Ordinance No. 2155 and industrial pretreatment Ordinance No. 1945, and all amendments thereto.

Trident Seafoods entered into a Discharge Agreement with the City of Anacortes, which set conditions on the wastewater discharge to the City of Anacortes system. The amount of waste discharged to the sewer system is limited to the following maximum quantities:

Parameter	Limit
Flow	550,000 gallons/month
Biochemical Oxygen Demand	93.0 pounds/day
Total Suspended Solids	10.0 pounds/day

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through, or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge.

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

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MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). The process wastewater is sampled after pretreatment, and before combining with any domestic wastestream.

The monitoring location is located after the effluent flow meter and prior to pumping to the sanitary sewer system.

The monitoring schedule is detailed in the proposed permit under Conditions S2 and S3. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

The Permittee shall attach a copy of the daily pH log to the monthly DMR that is submitted to the Department.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains Condition S4 as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment. The proposed permit requires submission of an O&M manual for the entire wastewater system.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the State from leachate of solid waste.

This proposed permit requires, under authority of RCW 90.48.080, that the Permittee develop and submit to the Department a solid waste plan to prevent solid waste from causing pollution of waters of the state.

NONROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for nonroutine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Ecology may authorize a direct discharge via the process wastewater outfall, require the wastewater to be placed through the facilities wastewater treatment process or require the water to be reused.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop a spill plan and best management plans to prevent this accidental release under Section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The proposed permit requires the Permittee to develop and implement a spill plan for preventing the accidental release of pollutants to State waters and for minimizing damages if such a spill occurs.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW therefore a slug discharge control plan is required [40 CFR 403.8 (f)].

GENERAL CONDITIONS

General Conditions are based directly on State laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires

the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for five (5) years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations (http://www.ecy.wa.gov/laws-rules/index.html)

Permit and Wastewater Related Information
(http://www.ecy.wa.gov/programs/wq/wastewater/index.html)

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APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page one of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public Notice of Application (PNOA) was published on June 12, 2003, and June 19, 2003, in the *Skagit Valley Herald* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department published a Public Notice of Draft (PNOD) on September 12, 2003, in the *Skagit Valley Herald* to inform the public that a draft permit and fact sheet were available for review. Interested persons were invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents were available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments were mailed to:

Water Quality Permit Coordinator
WA State Department of Ecology
Northwest Regional Office
3190 – 160th Avenue SE
Bellevue, WA 98008-5452

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30)-day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, 425-649-7201, or by writing to the address listed above.

This permit and fact sheet was written by Lori LeVander.

APPENDIX B—GLOSSARY

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.)

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short a period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference—A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) [including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the SWDA], sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)—The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through—A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User—A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day; or

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass-through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)—A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)—

1. All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and

2. Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of nondelegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a nonroutine, episodic nature, including but not limited to an accidental spill or a noncustomary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Suspended Solids (TSS)—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

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APPENDIX C— RESPONSE TO COMMENTS

The following comments were received by Wendy Steffensen via e-mail on Friday, September 26, 2003

Comments: I think there should be a stormwater plan for the Trident Seafoods Plant. It's not clear if there is any portion of the plant outside and/or storage of waste outside. If so, this is a stormwater concern. In addition, I am hoping that we can provide the impetus to get stormwater treatment for the parking lot section.
I look forward to getting your input/clarification on this subject.

Wendy Steffensen
North Sound BayKeeper
RE Sources
1155 North State Street #623
Bellingham, WA 98225
www.re-sources.org

Response: This permit is a State Waste Discharge Permit so I cannot include NPDES stormwater provisions. During my inspections, I haven't noticed any product or waste stored outside or coming in contact with stormwater.

Trident-Anacortes has applied for coverage under the General Stormwater Permit, #SO30008801. The permit requires operational controls to assure compliance and the development of a Stormwater Pollution Prevention Plan.

The following comments were received by John Franz, representing the City of Anacortes on Wednesday, September 24, 2003

Comment: Condition S1 – Add the following sentence "The Permittee is required to obtain and maintain compliance with a written authorization from the City of Anacortes prior to discharge."

Response: Ecology concurs. The sentence has been added.

Comment: Condition S2.A. Wastewater Monitoring – parameter pH – sampling frequency is identified as daily. The City of Anacortes requests that the sampling frequency be continuous and the reporting requirement be the daily high and low values. During the past two years, the City has collected a number of samples from Trident that produced pH test results that were either above 9.0 or below 6.0. Copies of records of these events are attached.

Response: Ecology concurs. The requested change has been made to the permit.

Comment: Condition S2.D. Laboratory Accreditation - Trident is not required to follow accredited procedures for pH analysis, however, Trident should be required to establish a routine maintenance schedule and perform routine two point calibration on the continuous pH monitor. In addition to calibration a check standard should be used three times per week. Records of these procedures should be dept for at least one year.

Response: Ecology concurs. The requested change has been made to the permit. Records are required to be kept for a minimum of three (3) years.

Comment: Condition S5. B.8. – pH limits are different than established in Condition S1.

Response: Condition S5 lists specific discharge prohibitions as required in 40 CFR 403.5(b). Because the permit contains specific Bypass Provisions in S4.B., it is conceivable that Trident could, on occasion, discharge wastewater outside the permit limitations listed in S1. Under no circumstances can Trident discharge any substance to the City of Anacortes system outside the pH limits listed in Condition S5.B.8.

Comment: Fact Sheet WASTEWATER CHARACTERIZATION
Oil and Grease – the values presented are not from the City of Anacortes laboratory. The Anacortes lab does not run oil and grease tests.

Response: The source of the information could not be located so the information in the table has been removed.

Comment: pH – The range for pH values since January 1, 2002 is 4.95 to 10.93.

Response: Comment noted. The table has been amended.

Comment: The permit seems to assume that all wastewater shall be discharged to the sewer. Trident has experienced some foaming problems with their wastewater discharge. This foam blocked the discharge sewer pipe causing sewage to be discharged to a parking lot storm drain. Trident has installed some equipment to help prevent this in the future. However, it should be clear in the permit that this is not permitted and it must be reported to the Dept. of Ecology and the City of Anacortes immediately when it occurs.

Response: Comment noted. The permit and fact sheet have been clarified to reflect your concerns. Condition S1 limits all wastewater discharges to pretreated process wastewater to the City of Anacortes sanitary sewer system. The permit does not permit any surface water discharges or land application of wastewater.